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# TRANSMITTAL OF APPEAL BRIEF

Docket No.  
SONY 3.0-026

In re Application of: Brian M. Siegel and Gregory D. Gudorf

Application No.  
09/805,534

Filing Date  
March 13, 2001

Examiner  
E. P. Leroux

Group Art Unit  
2161

Invention: METHOD AND SYSTEM FOR DISTRIBUTING PRODUCT INFORMATION

## TO THE COMMISSIONER FOR PATENTS:

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Dated: December 12, 2006

Arthur S. Ortega  
Attorney Reg. No. : 53,422  
LERNER, DAVID, LITTENBERG, KRUMHOLZ &  
MENTLIK, LLP  
600 South Avenue West  
Westfield, New Jersey 07090  
(908) 654-5000

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(Arthur S. Ortega)

Docket No.: SONY 3.0-026  
(PATENT)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Patent Application of:  
Siegel et al.

Application No.: 09/805,534

Group Art Unit: 2161

Filed: March 13, 2001

Examiner: E. P. Leroux

For: METHOD AND SYSTEM FOR  
DISTRIBUTING PRODUCT INFORMATION

**APPEAL BRIEF**

MS Appeal Brief - Patents  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Dear Sir:

Applicants hereby file this brief on Appeal to appeal the final rejection of claims 1, 2, 4-9, 12, and 14-20 in a final office action mailed July 20, 2006.

**REAL PARTIES IN INTEREST**

The real parties in interest in this case are the assignees of record: Sony Corporation, a Japanese corporation, having a place of business at 7-35 Kitashinagawa 6-Chome, Shinagawa-ku, Tokyo, Japan; and Sony Electronics Inc., a New Jersey corporation, having a place of business at 1 Sony Drive, Park Ridge, New Jersey 07656. The assignment of the present application to Sony Corporation and Sony Electronics Inc. was recorded in the United States Patent and Trademark Office on March 13, 2001 at Reel 011693, Frame 0398.

**RELATED APPEALS AND INTERFERENCES**

At present, there are no other appeals or interferences known to Appellant, Appellant's legal

representative, or the assignees, which will directly affect, be directly affected by, or have a bearing on the Board's decision in the pending appeal.

#### **STATUS OF CLAIMS**

Claims 1, 2, 4-9, 12 and 14-20 are pending in the present application. Claims 3, 10, 11 and 13 have been canceled. Claims 1, 2, 4-9, 12 and 14-20 were rejected in a final office action and such final rejection of claims 1, 2, 4-9, 12, and 14-20 is being appealed.

#### **STATUS OF AMENDMENTS**

A final office action rejecting claims 1, 2, 4-9, 12, and 14-20 was mailed on July 20, 2006. In response to the final office action, a notice of appeal was filed on October 10, 2006.

#### **SUMMARY OF CLAIMED SUBJECT MATTER**

Appellant's invention as recited in the independent claims (1, 6, 12 and 15) is directed to techniques for providing product information updates to dealers or users. Before discussing the Examiner's final rejection and the references applied therein, Appellant provides the following summary of the subject matter of the present application.

##### **1. Summary of the Subject Matter of the Application**

In an illustrative embodiment, a system 50 is disclosed in which a manufacturer server 71 is coupled to a dealer server 70 and a user computer 60 over the Internet 80. (Fig. 1; ¶¶ [0015-0016] of the present application.) The manufacturer server 71 provides product information and/or product information changes, to the dealer server 70 which, in turn, provides that information to the user computer 60. (Fig. 2; ¶¶ [0017-0022], [0040-0041].) The manufacturer server 71 includes a processor 83, a set of instructions 84 which are executed by processor 83 and a Product Information Database 300. (Fig. 3; ¶ [0023].) The Product Information Database 300 (Fig. 3; ¶ [0024]) has three tables including a Dealer Table

310, a Dealer-Product Authorization Table 330, and a Product Table 320.

The Dealer Table 310 comprises records having two fields, Dealer ID 311 and Dealer Address 312. (Fig. 3; ¶ [0024].) The values contained in Dealer ID field 311 correspond to the Dealer ID 76 values of the various dealer servers, such as Dealer Server 70. The Dealer Address field 312 contains the electronic address of the respective dealer and, more particularly, states where product information is to be sent to the dealer. For example, dealer "Dealer B" is associated with an electronic address "CompanyDealerB.com."

The Product Table 320 contains records describing the characteristics of a product. (Fig. 3; ¶ [0025].) A characteristic represent a feature of the product and a characteristic value refers to a specific data value associated with the characteristic. For example, "R100-wholesaleprice" represents a characteristic of a product, namely the price of a product, and "\$45" represents the characteristic value.

Each characteristic of a product information has a code (Product Information and Identification Code (PIIC) 321) assigned to it. Thus, for each code (PIIC), there is a characteristic value (Content Item 322) associated with it which describes some feature of that product. For example, the price of the radio may be stored in Product Table 320 by placing a record in the table whereby the characteristic is "R100-wholesaleprice" and the characteristic value is "\$45."

Not every dealer will need, or be authorized to, access every change to a characteristic value of a product stored in Product Table 320. (Fig. 3; ¶ [0026].) For example, some dealers may not sell certain products and, therefore, would not need or be authorized to obtain changes to the characteristic values related to the product. Thus, if there is

a change to the characteristic value for that product, only those authorized to receive such changes would receive them.

In that regard, the Dealer-Product Authorization Table 330 contains values indicating whether or not a particular dealer is entitled to obtain changes to the characteristic values relating to a product. (Fig. 3; ¶ [0027].) If a dealer is authorized, then Dealer-Product Authorization Table 330 will contain a record specifying the dealer's Dealer ID and the item's code (PIIC). Otherwise, if there is no such authorization, then there will be no such record.

In operation, according to one embodiment, whenever there are changes to the characteristic values related to a product, those changes are sent only to those dealers that are authorized to receive such changes. (¶ [0040].) Specifically, characteristic values related to a product which is provided to dealers is stored in Product Table 320 such that every characteristic value is associated with a particular code (PIIC). Moreover, the Dealer-Product Authorization Table 330 preferably includes an Updates field 333 indicating whether or not the dealer is automatically informed of changes to the characteristic values related to a product.

Whenever there are changes in the characteristic values related to a product in Product Table 320, the manufacturer server 71 creates an XML document that contains those changes. (¶ [0041].) The server then queries Dealer-Product Authorization Table 330 for all records whereby the value in the PIIC Field 331 matches the value contained in the PIIC Field 321 of the changed characteristic value in Product Table 320, and whereby the value of the Updates field is True. Based on the Dealer ID's contained in this list of records, the Dealer Addresses 312 are extracted from Dealer Table 310. The XML document containing the changes is then electronically distributed to all of the addresses in the list. For example, a

product such as a radio can have a characteristic such as price ("R100-wholesaleprice") and a characteristic value such as "\$45." If the value of the price changes, such as from "\$45" to "\$50," then an XML document containing those changes would be sent to every dealer authorized to automatically receive updates to the price of the product. Because updates can include additions, modifications and deletions, the claimed invention provides a powerful tool for sending changes to characteristic values related to a product to those authorized to receive them.

## **2. Summary of the Claims-At-Issue**

### **a. Claim 1**

Claim 1 is directed to a computer program product embodied on one or more computer-readable media having instructions executable by a processor for performing a method of providing product information. The claimed method can be illustrated with reference to the tables in Fig. 3 and corresponding description in paragraphs [0015-0018], [0023-0027], and [0040-0041]. A manufacturer server 71 associates codes with characteristics of a product (e.g., PIIC 321 = "R100-wholesale-price"). The manufacturer server 71 also stores a characteristic value (e.g., Content Item 322 = "\$45") associated with the characteristic. Referring to the Dealer-Product Authorization Table 330, the manufacturer server 71 associates an identity of an entity with product codes (e.g., Dealer ID 332 = PIIC 331) including setting update values (e.g., Updates 333) indicating whether the entity is authorized to receive changes relating to the code characteristic values associated with the code. The manufacturer server 71 (or other device) can change the characteristic values to produce a changed characteristic value (e.g., Content Item 322) and retrieve the identity of the entity (e.g., Dealer ID 332) based on the changed characteristic value. The manufacturer server 71 determines whether the entity is authorized to be sent the

changed characteristic value based on the update value (e.g., Updates 333), and sends the changed characteristic value to the entity based on that determination (e.g., Dealer Address 312).

Notably, an entity is associated with codes and update values. The codes are associated with product characteristics and characteristic values. The update values indicate whether the entity is authorized to receive changes to the values associated with the codes. Moreover, the identity of the entity is retrieved based on the changed characteristic values. In addition, the update values are used to determine whether the entity is authorized to be sent the changed characteristic values.

**b. Claim 6**

Claim 6 is directed to a computer-implemented method of providing information about a product. The claimed method can be illustrated with reference to the data tables shown in Fig. 3 and corresponding description in paragraphs [0015-0018], [0023-0027], and [0040-0041]. The method includes providing product data associating information codes to information about a product (e.g., PIIC 321 = Content Item 322), providing destination data (e.g., Dealer Table 310) correlating the information codes (e.g., PIIC 321) to entities (e.g., Dealer ID 332), storing an entity-data association (e.g., Dealer-Product Authorization Table 330), and modifying the information (e.g., Content Item 322) about the product. Upon modification of the product information, the method includes identifying a first entity (e.g., Dealer ID 332) based upon the modified product information and the information code (e.g., PIIC 331) associated with the product, the product data (e.g., Content Item 322), and the destination data (e.g., Dealer Address 312). The method further includes determining whether the first entity (e.g., Dealer ID 332) is authorized to be sent the modified product information based on the entity-data

association (e.g., Dealer-Product Authorization Table 330) and a distinct update value (e.g., Updates 333) that indicates whether the first entity should be sent the modified information. The modified information (e.g., Content Item 322) about the product is transmitted to the first entity only if the first entity is determined to be authorized to be sent the modified information.

It should be noted that an entity is identified based upon the modified product information and the information code associated with the product, the product data, and the destination data. In addition, the entity-data association and update value are used to determine whether the entity is authorized to be sent the modified product information.

c. Claim 12

Claim 12 is directed to a system of providing product information. The claimed system can be illustrated with reference to the data tables shown in Fig. 3 and corresponding description in paragraphs [0015-0018], [0023-0027], and [0040-0041]. Referring to the Product table 320, the system includes means (e.g., manufacturer server 71 including processor 83 and instructions 84) for associating a first code with a first characteristic of a product (e.g., PIIC 321 = Content Item 322) and a second code with a second characteristic of the same product (e.g., PIIC 321 = Content Item 322). The system also includes means for storing (e.g., Product information database 300) a first characteristic value (e.g., "class:radio") associated with the first characteristic (e.g., Content Item 322) and a second characteristic value (e.g., "stereo:Yes") associated with the second characteristic (e.g., Content Item 322).

The system also includes means for associating (e.g., Dealer-Product Authorization Table 330) the identity of a first vendor (e.g., Dealer ID 332) with at least one of the first or second codes (e.g., PIIC 331) including setting one or more



distinct update values (e.g., Updates 333) that provide an indication of whether the first vendor is authorized to automatically receive changes to the first or second characteristic values.

The system further includes means for changing (e.g., manufacturer server 71 including processor 83 and instructions 84) at least one of the first or second characteristic values, means for retrieving (e.g., manufacturer server 71) the identity of the first vendor based on the changed characteristic value, means for determining (e.g., manufacturer server 71) whether the first entity is authorized to be automatically sent changes to either the first or second characteristic values based on one of the one or more distinct update values, and means for sending (e.g., manufacturer server 71) the changed characteristic value to the first vendor in response to the determination.

It is to be noted that a vendor is associated with codes and update values where the codes are associated with product characteristics and characteristic values and the update values indicate whether the vendor is authorized to receive changes to the values associated with the codes. Moreover, the identity of the vendor is retrieved based on the changed characteristic values. In addition, the update values are used to determine whether the vendor is authorized to be sent the changed characteristic values.

**d. Claim 15**

Claim 15 is directed to a system for providing product information. The claimed system can be illustrated with reference to the data tables shown in Fig. 3 and corresponding description in paragraphs [0015-0018], [0023-0027], and [0040-0041]. The system (e.g., manufacturer server 71) includes a processor (e.g., processor 83), data (e.g., product information database 300) and instructions (e.g.,

instructions 84) executable by the processor. The instructions include associating a first code with a first characteristic of a product (e.g., PIIC 321 = Content Item 322) and a second code with a second characteristic of the same product (e.g., PIIC 321 = Content Item 322), storing (e.g., Product Table 320) a first characteristic value (e.g., "class:radio") associated with the first characteristic (e.g., Content Item 322) and a second characteristic value (e.g., "stereo:Yes") associated with the second characteristic (e.g., Content Item 322), associating (e.g., Dealer-Product Authorization Table 330) an identity of a first entity (e.g., Dealer ID 332) with at least one of the codes (e.g., PIIC 331) including storing one or more distinct update values (e.g., Updates 333) indicating whether the first entity is authorized to automatically receive updates to a characteristic associated with a code. The instructions also include changing at least one of the characteristic values (e.g., "class:radio"), retrieving the identity of the first entity (e.g., Dealer ID 332) based on the changed characteristic value, determining whether the first entity is authorized to be automatically sent changes to the at least one characteristic value based on one of the one or more distinct update values (e.g., Updates 333), and sending the changed characteristic value to the first entity (e.g., Dealer ID 332) based on the determination.

It should be noted that in claim 15, like in claim 1, an entity is associated with codes and update values wherein the codes are associated with product characteristics and characteristic values and the update values indicate whether the entity is authorized to receive changes to the values associated with the codes. Moreover, the identity of the entity is retrieved based on the changed characteristic values. In addition, the update values are used to determine whether the

entity is authorized to be sent the changed characteristic values.

**GROUND OF REJECTION TO BE REVIEWED ON APPEAL**

1. Whether or not claims 1, 2, 6, 12, and 15 are anticipated under 35 U.S.C. § 102(e) by U.S. Patent No. 6,321,236 issued to *Zollinger et al.* (hereafter *Zollinger*).

2. Whether or not claims 4, 5, 7-9, 14, and 16-18 are patentable under 35 U.S.C. § 103(a) over *Zollinger* in view of U.S. Patent No. 5,913,210 issued to *Call* (hereafter *Call*).

3. Whether or not claims 19 and 20 are patentable under 35 U.S.C. § 103(a) over *Zollinger* in view of U.S. Patent No. 6,185,601 issued to *Wolff* (hereafter *Wolff*).

4. Whether or not the specification adequately supports the terms "code" and "characteristic value" as used in the claims.

**ARGUMENT**

1. Appellant Respectfully Submits That  
Claims 1, 2, 6, 12, And 15 Are Not  
Anticipated Under 35 U.S.C. § 102(e) By *Zollinger*

- a. *Zollinger* Fails To Disclose  
"Retrieving The Identity Of  
The First Entity Based On The  
Changed Characteristic Value"  
As Recited In The Claimed Invention

The Examiner asserted that *Zollinger* discloses "retrieving the identity of the first entity based on the changed characteristic value [differencing engine 30, Fig. 1, col 6, lines 60-67]." (Final Office Action 3, July 20, 2006.)

Appellant respectfully disagrees with the Examiner's characterization of *Zollinger* for at least the following reasons. The claimed invention is generally directed to controlling which users can receive changes to characteristic values related to product information. It recites as a feature associating an entity with codes which are associated with product characteristics and characteristic values. The claimed

invention further recites retrieving the identity of the entity based on the changed characteristic values. In other words, it is the change in the characteristic values in product information that causes the identity of an entity to be retrieved. As explained below, Zollinger does not disclose this feature of the claimed invention.

Zollinger discloses a system and method for distributing changes made to a database or information stored on a server or main computer 68 to one or more client systems or users 48. (Zollinger col.7 ll.13-23.) In Zollinger's system, information is stored in tables. (See *id.* FIG.1 and its description.) In particular, the server 68 includes a current table 20 which is continuously accessed and updated by other programs 22. (*Id.* col.6 ll.46-53.) Thus, the current table 20 changes continuously. (*Id.* ll.51-53.) A reference table 28 is maintained to track the changes to current table 20. (*Id.* ll.54-59.) A version identifier 26 associated with the reference table 28 is used to track changes to current table 20. (*Id.*)

A differencing engine 30 takes as input the current table 20 and the reference table 28 and outputs the differences between these two tables as well as a version identifier 42. (*Id.* col.6 l.60 to col.7 l.3.) Thus, the differencing engine 30 only determines the differences between the current information and the reference information, specifically the current and reference table, and passes such information to block 38 for storage. This information once stored is not used as a basis for retrieving any information. In that regard, applicants respectfully submit that the engine 30 is not disclosed as "retrieving the identity of the first entity based on the changed characteristic values," as asserted by the Examiner. Instead, the difference engine 30 is only disclosed as retrieving all the information in two tables 20, 28 and computing differences between the information stored in those

two tables. Indeed, the difference is not used as the basis for later retrieval. The differences are also not equivalent to "changed characteristic values."

Thus, whatever information *Zollinger* may retrieve, such retrieval is not disclosed or suggested as being based on "the changed characteristic value." The difference engine 30 simply does not base its retrieval of information on any type of changed values or information. Instead, it bases retrieval on version identifiers. But version identifiers are not characteristic values. They are not associated with products. In addition, *Zollinger* does not teach or suggest that the difference engine 30 retrieves the "identity of the first entity" or any entity, client or user for that matter based on a changed characteristic value. Rather, it is a client that requests updates. (*Zollinger* col.2 1.66 to col.3 1.3; col.3 11.53-56; col.8 11.6-13.) Furthermore, when synchronization component 46 interfaces with clients 48 requesting updates and accesses the profile database 56, that database does not store changes in characteristic values associated with products. (*Id.* col.8 11.15-27.) Therefore, client access to updates is not taught or suggested as being based on change to characteristic values. Thus, synchronization component 46 is not disclosed as determining access based on "changed characteristic values."

In summary, the claimed invention includes retrieving the identity of the entity based on the changed characteristic values. In other words, it is the change in the characteristic values in product information that causes the identity of an entity to be retrieved. For example, to illustrate, referring to Fig. 3 of the present invention, Product table 320 contains a record comprising a characteristic "R100-wholesaleprice" representing a price of radio which is associated with a characteristic value of "\$45." Further, the characteristic "R100-wholesaleprice" is associated with entity "Dealer B" in

Dealer-Product Authorization Table 330. In operation, if the characteristic value changes, for example, from "\$45" to "\$50," the system knows that the changes to the characteristic value are associated with the entity "Dealer B" and so the system then retrieves the identity of the entity "Dealer B" which includes accessing the corresponding entity information in the Dealer Table 310. Thus, in this example, the system of the present invention retrieves the identity of the entity ("Dealer B") based on the changed characteristic values (price change from \$45 to \$50). In this manner, changes to the price of a product may be automatically sent to "Dealer B" when changes to the price occur.

*Zollinger* does not disclose this feature of the claimed invention. In particular, although *Zollinger* retrieves information about a client, however, such retrieval is based on a request for information from the client and not based on changes to the information. For example, *Zollinger* may store and update product information, such as price information, in its database. But changes to that information do not form a basis for retrieving the identity of an entity. Changes to that information are simply stored in the database to be accessed by a user at later time, if desired. Indeed, it is only when the client logs into the *Zollinger* system and requests information or data from the system that the identity of the client is retrieved. Thus, in *Zollinger*, a client is not sent information because of changes in the information studied. Rather, users requiring updates must request information. Further, there is no association between clients and changes to information. The only way for a client to know about such changes is to request information at which point it will receive the latest information.

Thus, Appellant respectfully submits that *Zollinger* does not anticipate claims 1 and 15 as they recite "retrieving

the identity of the first entity based on the changed characteristic value." Claim 6 is also not anticipated as it recites "identifying a first entity based upon the modified product information." Claim 12 is also not anticipated as it recites "means for retrieving the identity of the first vendor based on the changed characteristic value."

Moreover, with respect to claim 6, in the "Response to Arguments" section of the final office action, the Examiner also asserted that *Zollinger* discloses "identifying a first entity based upon the modified product information." (Final Office Action 9-10.) To support his argument, the Examiner made reference to column 7, lines 33-40 of *Zollinger*. However, the passage simply makes reference to a parts database and does not disclose or suggest "identifying a first entity based upon the modified product information" as recited in claim 6 of the present application. Thus, claim 6 is also not anticipated by *Zollinger* for at least these additional reasons.

Moreover, with respect to claim 12, in the "Response to Arguments" section of the final office action, the Examiner also asserted that *Zollinger* discloses "means for retrieving the identity of the first vendor based on the changed characteristic value." (Final Office Action 10.) To support its argument, the Examiner made reference to the rejection of claim 6 above. However, as explained above, the cited passage in connection with the rejection of claim 6 simply makes reference to a parts database and does not disclose the above limitation of claim 6. Likewise, the cited passage does not disclose or suggest a "means for retrieving the identity of the first vendor based on the changed characteristic value" as recited in claim 12 of the present application. Thus, claim 12 is also not anticipated by *Zollinger* for at least these additional reasons.

Appellant also respectfully submits that the other references of record do not make up for this deficiency in

Zollinger. Therefore, these claims cannot be rendered obvious by the references of record, either individually or when combined.

**b.   Zollinger Fails To Disclose "Setting  
One Or More Distinct Update Values  
Indicating Whether The First Entity  
Is Authorized To Receive Changes Relating  
To The First Or Second Characteristic  
Values Associated With The First Or  
Second Code" As Recited In The Claimed Invention**

The Examiner also asserted that Zollinger discloses "setting one or more distinct update values indicating whether the first entity is authorized to receive changes relating to the first or second characteristic values associated with the first or second code [profile database 56, Fig. 1, col. 8, lines 15-30, col. 12, lines 15-30, col. 4, lines 5-15]." (Final Office Action 3.)

Appellant respectfully disagrees with the Examiner's characterization of Zollinger for at least the following reasons. The present application includes techniques to control whether an entity is authorized to receive changes to characteristic values related to a product. The techniques include associating an entity with codes and update values. The codes are associated with product characteristics and characteristic values. The techniques further include retrieving the identity of the entity based on the changed characteristic values. The update values are used to determine whether the entity is authorized to be sent the changed characteristic values. In other words, the identity of an entity is automatically retrieved in response to changes in characteristics values. However, before the changes in characteristic values are sent to an entity, an update value associated with the entity is checked to determine whether the entity is authorized to receive such changes.

To illustrate, as explained above, whenever changes to characteristic values related to a product occur, such changes



are sent to those entities or dealers that are authorized to receive such changes. (§ [0040].) For instance, if there is a change to price such as from "\$45" to "\$50," the system knows that the price changes are associated with a particular dealer and so the system then retrieves the identity of the dealer. Before the dealer is authorized to automatically receive changes to the price of a product, the system checks the status of the Update field 333 associated with the dealer to determine whether it is authorized to receive such changes.

As explained above, *Zollinger* discloses that when a client 48 connects to the server 68, the client identifies itself to the server synchronization component 46. (*Zollinger* col.8 11.6-13.) The server synchronization component 46 thereafter accesses a profile database 56 in order to validate the clients as part of a security feature, thereby assuring that a client is valid and can receive or request updated information. (*Id.* 11.14-16; col.12 11.15-30.) If the synchronization component 46 authenticates the client 48, it then "determine[s] which database tables are applicable to the client making the request" based on the profile database 56. (*Id.* col.12 11.31-33.) As noted by the Examiner, the profile database 56 "contains information on each client authorized to received updates from the server synchronization component 46 including . . . a list of database tables authorized for update by the client; the version number for each authorized database table." (*Id.* col.8 11.15-27.) *Zollinger*, however, does not disclose "one or more distinct update values indicating whether the first entity is authorized to receive changes relating to the first or second characteristics values" associated with a product code. This is clearly the case because *Zollinger* first determines whether a user is authorized to receive any information as part of the synchronization request. (*Id.* col.12 11.21-23.) The synchronization request process is not disclosed

as being based on "distinct update values." That is, update values indicating whether an entity is authorized to receive changes is not disclosed.

In addition, even though the profile database 56 may be accessed as part of the synchronization process, that database is not disclosed as including "distinct update values" as is recited in the claims. Rather, as best understood, it is organized by client and in relevant part contains "a list of database tables authorized to be updated by the client" and the version for each such authorized table. However, this is not what's claimed.

In particular, claims 1 recites "one or more distinct update values indicating whether the first entity is authorized to receive changes relating to the first or second characteristic values associated with the first or second code."

Further in that regard, claim 6 recites "a distinct update value that indicates whether the first entity should be sent the modified information." Claim 12 recites "setting one or more distinct update values that provide an indication of whether the first vendor is authorized to automatically receive changes to the first or second characteristic values." Claim 15 recites "one or more distinct update values indicating whether the first entity is authorized to automatically receive updates to a characteristic associated with a code." Appellant respectfully submits that this feature of claims 1, 6, 12 and 15 is not at disclosed by Zollinger. Rather, it is only after Zollinger authenticates a user as part of separate synchronization process that the profile database 56 is accessed to determine what the information the client may receive. Further in that regard, the profile database does not disclose or suggest storing or maintaining "distinct update values" as claimed.

Thus, Appellant respectfully submits that Zollinger does not anticipate claims 1 and 15 as they recite "setting one or more distinct update values indicating whether the first entity is authorized to receive changes relating to the first or second characteristic values associated with the first or second code." Claim 6 is also not anticipated as it recites "identifying a first entity based upon the modified product information." Claim 12 is also not anticipated as it recites "means for retrieving the identity of the first vendor based on the changed characteristic value."

Appellant also respectfully submits that the other references of record do not make up for this deficiency in Zollinger. As such, those references cannot be combined with Zollinger to render claims 1, 6, 12 or 15 of the present application obvious for at least the foregoing reasons.

**c. Zollinger Fails To Disclose "Associating A First Code With A First Characteristic Of A Product And A Second Code With A Second Characteristic Of The Same Product" And "Associating An Identity Of A First Entity With At Least One Of The First Or Second Codes" As Recited In The Claimed Invention**

In the final office action, using the language of claim 1, the Examiner asserted that Zollinger discloses "associating a first code with a first characteristic of a product and a second code with a second characteristic of the same product [parts database, col 7, lines 34-40, price information, col 1, line 63]." (Final office action, page 2.) Furthermore, the Examiner asserted that Zollinger discloses "associating an identity of a first entity with at least one of the first or second codes . . . [profile database 56, Fig. 1, col 8, lines 15-30, col 12, lines 15-30, col 4, lines 5-15]." (Final Office Action 3.)

Appellant respectfully disagrees with the Examiner's characterization of Zollinger for at least the following

reasons. The present application provides techniques for controlling which users can receive changes to characteristic values related to a product. The techniques include associating an entity with codes which, in turn, are associated with product characteristics and characteristic values. As explained above, Fig. 3 of the present application shows a Product Information Database 300 comprising three tables including a Dealer Table 310, a Dealer-Product Authorization Table 330, and a Product Table 320. The Product Table 320 contains records describing the characteristics of a product including characteristic values. Each individual item of product information has a Product Information and Identification Code (PIIC) 321 assigned to it. For example, one item of information may be the price of a product. For each PIIC, there is also a Content Item 322 associated with it. Thus, the price of a radio may be stored in Product Table 320 by placing a record in the table whereby the PIIC 321 is "R100-wholesaleprice" and the Content Item 322 is "\$45" representing the price of the radio. In operation, a manufacturer server 71 associates codes with characteristics of a product (e.g., PIIC 321 = "R100 wholesaleprice"). The manufacturer server 71 also stores a characteristic value associated with the characteristic (e.g., "R100-wholesaleprice" = "\$45"). Referring to the Dealer-Product Authorization Table 330, the manufacturer server 71 associates an identity of an entity (e.g., Dealer ID 332) with product codes (e.g., PIIC 331) including setting update values (e.g., Updates 333) indicating whether the entity is authorized to receive changes relating to the characteristic values associated with the code.

However, close inspection of *Zollinger* reveals that *Zollinger* does not disclose the above limitations of claim 1 for at least the following reasons. *Zollinger* discloses a parts database that is centrally managed and accessed by field service

representatives (*Zollinger*, col. 7, lines 34-40.) and the parts database may include price information. (*Id.*, col. 1, line 63.) However, *Zollinger* makes no mention of a code or of associating any code with the price information or with any component of the parts database as in the claimed invention. Thus, *Zollinger* does not disclose "associating a first code with a first characteristic of a product and a second code with a second characteristic of the same product" as recited in claim 1 of the present application.

Thus, Appellant respectfully submits that *Zollinger* does not anticipate claims 1 and 15 as they recite "associating a first code with a first characteristic of a product and a second code with a second characteristic of the same product" and "associating an identity of a first entity with at least one of the first or second codes." Claim 6 is also not anticipated as it recites "providing product data associating information codes to information about a product, providing destination data correlating the information codes to entities, storing an entity-data association." Claim 12 is also not anticipated as it recites "means for associating a first code with a first characteristic of a product and a second code with a second characteristic of the same product, ... means for associating the identity of a first vendor with at least one of the first or second codes." Appellant also respectfully submits that the other references of record do not make up for this deficiency in *Zollinger*. Therefore, these claims cannot be rendered obvious by the references of record, either individually or when combined.

**2. Appellant Respectfully Submits That  
Claims 4, 5, 7-9, 14 And 16-18 Are  
Patentable Under 35 U.S.C. § 103(a)  
Over *Zollinger* In View Of Call**

Appellant respectfully submits that the other references of record in the application do not make up for this

deficiency in *Zollinger*. As such, those references cannot be combined with *Zollinger* to render claims 1, 6, 12 or 15 of the present application obvious for at least the foregoing reasons. As all the other claims depend from one these claims, the other claims are also not anticipated or rendered obvious for at least the foregoing reasons.

**3. Appellant Respectfully Submits That  
Claims 19 And 20 Are Patentable Under  
35 U.S.C. § 103(a) Over *Zollinger* In View Of *Wolff***

Appellant respectfully submits that the other references of record in the application do not make up for this deficiency in *Zollinger*. As such, those references cannot be combined with *Zollinger* to render claims 1, 6, 12 or 15 of the present application obvious for at least the foregoing reasons. As all the other claims depend from one these claims, the other claims are also not anticipated or rendered obvious for at least the foregoing reasons.

**4. Appellant Respectfully Submits That  
The Specification Adequately Supports  
The Terms "Code" And "Characteristic  
Value" As Used In The Claims**

Although the foregoing addresses all the substantive issues raised in the Final Office action, Appellant respectfully believes it is necessary to separately address the Examiner's response to applicant's arguments.

In particular, the Examiner asserted in his "Response to Arguments" that the "Applicant fails to disclose how the 'code' is associated with the first entity. Furthermore, Applicant fails to disclose how the 'code' identifies a first entity. The meaning of 'characteristic value' is also unclear from the specification." (Final Office Action 7-8, under "Response to Arguments.")

Appellant respectfully submits that the specification provides clear support for the above terms "code" and

"characteristic values" and that there is no ambiguity as to the meaning of such terms.

As indicated in the Summary above, in accordance with one embodiment of the present invention, referring to the Product Table 320, each individual item of product information has a code referred to as a Product Information and Identification Code (PIIC) 321 assigned to it. (See also ¶ [0025].) Referring to the Dealer-Product Authorization Table 330 and paragraph [0027], the product code (e.g., PIIC 331) is associated an identity of an entity (e.g., Dealer ID 332). Moreover, the PIIC field 331 of Table 330 is linked to the PIIC field 321 of Table 320.

For each PIIC, there is also a Content Item 322 associated with it. For example, one item of information may be the price of the product. This Content Item 322 is also referred to as characteristic of the product. A characteristic represents a feature of the product and a characteristic value refers to a specific data value associated with the characteristic. For example, "R100-wholesaleprice" represents a characteristic of a product, namely the price of a product, and "\$45" represents the characteristic value. In one embodiment, the manufacturer server 71 associates a code (e.g., PIIC 321) with the characteristic of a product (e.g., "R100-wholesaleprice"). The manufacturer server 71 also stores the characteristic value (e.g., "\$45") associated with the characteristic (e.g., "R100-wholesaleprice").

Moreover, Appellant believes that the prosecution history of the present application indicates that the meaning of these terms was understood and supported. For example, in a final office action dated June 14, 2005, the Examiner asserted that the term "code" as recited in the claims was disclosed as "universal product code and second Internet address" in the Call reference. (Final Office Action 3, June 14, 2005.)

Thus, Appellant respectfully submits that the specification does indeed provide support for the language of these terms of the claims of the present application.

CONCLUSION

Appellant respectfully submits that claims 1, 2, 6, 12, and 15 are not anticipated by *Zollinger*. In addition, claims 4, 5, 7-9, 14, and 16-18 are patentable over *Zollinger* in view of *Call*, and claims 19 and 20 are patentable over *Zollinger* in view of *Wolff*. Moreover, it is submitted that the specification provides clear support for the terms of the claimed invention. Accordingly, it is respectfully submitted that the Examiner erred in rejecting claims 1, 2, 4-9, 12,



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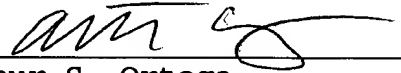
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and 14-20 and a reversal of such rejections by this Honorable Board is solicited.

Dated: December 12, 2006

Respectfully submitted,

By



Arthur S. Ortega

Registration No.: 53,422  
LERNER, DAVID, LITTENBERG,  
KRUMHOLZ & MENTLIK, LLP  
600 South Avenue West  
Westfield, New Jersey 07090  
(908) 654-5000  
Attorney for Applicants

**APPENDIX A - CLAIMS**

1. A computer program product embodied on one or more computer-readable media having instructions executable by a processor for performing a method of providing product information comprising:

associating a first code with a first characteristic of a product and a second code with a second characteristic of the same product,

storing a first characteristic value associated with the first characteristic and a second characteristic value associated with the second characteristic,

associating an identity of a first entity with at least one of the first or second codes including setting one or more distinct update values indicating whether the first entity is authorized to receive changes relating to the first or second characteristic values associated with the first or second code,

changing at least one of the characteristic values to produce a changed characteristic value,

retrieving the identity of the first entity based on the changed characteristic value,

determining whether the first entity is authorized to be sent the changed characteristic value based on one of the one or more distinct update values, and

sending the changed characteristic value to the first entity based on the determination.

2. The computer program product of claim 1 further including associating the identity of a second entity with the same code as that associated with the first entity, retrieving the identity of the second entity based on the changed value and another of the one or more update values, and sending the changed value to the second entity.

3. (canceled).

4. The computer program product of claim 1 wherein sending the changed characteristic value comprises sending the changed characteristic value by email.

5. The computer program product of claim 4 wherein retrieving the identity of the first entity includes retrieving an electronic address of the first entity.

6. A computer-implemented method of providing information about a product comprising:

    providing product data associating information codes to information about a product,

    providing destination data correlating the information codes to entities,

    storing an entity - data association,

    modifying the information about the product,

    identifying a first entity based upon the modified product information and the information code associated with the product, the product data, and the destination data,

    determining whether the first entity is authorized to be sent the modified product information based on the entity-data association and a distinct update value that indicates whether the first entity should be sent the modified information, and

    transmitting the modified information about the product to the first entity only if the first entity is determined to be authorized to be sent the modified information.

7. The method of claim 6 wherein the modified product information is transmitted over a network and the first entity is a computer on the network.

8. The method of claim 7 wherein the network is the Internet.

9. The methods of claims 1 or 6 wherein the product is a service.

10. (canceled).

11. (canceled).

12. A system of providing product information comprising:

means for associating a first code with a first characteristic of a product and a second code with a second characteristic of the same product,

means for storing a first characteristic value associated with the first characteristic and a second characteristic value associated with the second characteristic,

means for associating the identity of a first vendor with at least one of the first or second codes including setting one or more distinct update values that provide an indication of whether the first vendor is authorized to automatically receive changes to the first or second characteristic values,

means for changing at least one of the first or second characteristic values,

means for retrieving the identity of the first vendor based on the changed characteristic value,

means for determining whether the first entity is authorized to be automatically sent changes to either the first or second characteristic values based on one of the one or more distinct update values, and

means for sending the changed characteristic value to the first vendor in response to the determination.

13. (canceled).

14. The system of claim 12 wherein the means for sending the changed value comprises means for sending the value by email.

15. A system for providing product information comprising:

a processor, data and instructions executable by the processor,

the instructions including:

associating a first code with a first characteristic of a product and a second code with a second characteristic of the same product;

storing a first characteristic value associated with the first characteristic and a second characteristic value associated with the second characteristic;

associating an identity of a first entity with at least one of the codes including storing one or more distinct update values indicating whether the first entity is authorized to automatically receive updates to a characteristic associated with a code;

changing at least one of the characteristic values;

retrieving the identity of the first entity based on the changed characteristic value;

determining whether the first entity is authorized to be automatically sent changes to the at least one characteristic value based on one of the one or more distinct update values;  
and

sending the changed characteristic value to the first entity based on the determination.

16. The system of claim 15 wherein the system comprises a server connected to a network and the first entity comprises another server on the network.

17. The system of claim 15 wherein the system comprises a server connected to a network, the first and second characteristic values are maintained by a seller, and the first entity is a buyer of the product from the seller.

18. The system of claims 12 or 15 wherein the product is a service.

19. The computer program product of claim 1 wherein the distinct update values comprise a Boolean value indicating whether the first entity is automatically authorized to receive changes relating to the first or second characteristic values.

20. The method of claim 6 wherein the distinct update value comprise a Boolean value that indicates whether the first entity should be sent the modified information.

**APPENDIX B - EVIDENCE**

None.

**APPENDIX C - RELATED PROCEEDINGS**

None.